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January 8, 2018

VIA ECF

Hon. Michael A. Hammer, U.S.M.J.
United States District Court,
District of New Jersey
M.L.K., Jr. Fed. Bldg & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *V. Mane Fils v. Centrome, Inc. d/b/a Advanced Biotech*
Civil Action No. 17-2038 (KM)(MAH)
Our File No. : 21428.10507

Dear Judge Hammer:

I represent defendant Centrome, Inc. d/b/a Advanced Biotech (hereinafter "ABT") in the above referenced matter and am writing to request that all current deadlines be extended for a period of thirty (30) days to address the issues that have arisen due to the closing of my prior law firm, Sedgwick, LLP. Counsel for plaintiff, V. Mane Fils, consents to, and joins in, this request to extend the current deadlines.

In late November 2017, my prior law firm, Sedgwick LLP, was forced to make the difficult decision to close its doors as of December 31, 2017. As a result, the attorneys representing defendant ABT were left to find new positions at other law firms (or on their own) and to then transition their practices to the new firms while also taking the necessary steps to close the existing offices located around the world.

I along with a number of other people at Sedgwick did our best to try and keep everything moving forward during the closing of the firm, but we were unable to meet the existing deadlines. I kept in touch with counsel for Plaintiff during this time to advise them of the issues created by the closing of the Sedgwick firm, and of the time and effort required to move this case (and many others) to my new firm. This process was further complicated by the fact that many of the people involved in

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this action worked in other Sedgwick offices, and each of them have been forced to transition their practices to different law firms in other states. Addressing all of the logistical issues (the transfer of people, physical offices, files, and documents along with the transfer of all electronic files and data) associated with a move of this nature is difficult even when you are moving a single lawyer or single office, but to have to address these issues for a couple of hundred lawyers at the same time has made the process extremely difficult and time consuming – and this, unfortunately, has caused additional delay.

On the positive side, the increased communication between counsel has opened the door to settlement discussions. Although it is premature to comment on the possible success of these discussions, the additional time (the 30 day extension of all present deadlines) will allow counsel and our respective clients to fully consider the prospect of settlement before either side must expend the additional time, effort and expense of completing discovery – which too has value. For these reasons, I respectfully request that all deadlines in this matter be extended for a period of thirty (30) days.

I thank Your Honor for your time and consideration. Please do not hesitate to contact me should Your Honor have any questions or concerns about this request.

Respectfully,

/s/ Martin J. Healy

Martin J. Healy

cc: All Counsel of Record (via ECF)